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*Attorneys for Intervenor-Defendants
Northern Alaska Environmental Center,
Alaska Wilderness League, Environment
America, and Sierra Club*

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

VOICE OF THE ARCTIC IÑUPIAT,

Plaintiff,

v.

BUREAU OF LAND MANAGEMENT, *et al.*,

Defendants,

and

NORTHERN ALASKA ENVIRONMENTAL
CENTER, *et al.*,

Intervenor-Defendants.

Case No. 3:24-cv-00136-SLG

CONOCOPHILLIPS ALASKA, INC.,

Plaintiff,

Case No. 3:24-cv-00142-SLG

v.

U.S. DEPARTMENT OF THE INTERIOR, *et al.*,

Defendants,

and

NORTHERN ALASKA ENVIRONMENTAL
CENTER, *et al.*,

Intervenor-Defendants.

NORTH SLOPE EXPLORATION, LLC and
NORTH SLOPE ENERGY, LLC,

Plaintiffs,

v.

U.S. DEPARTMENT OF THE INTERIOR, *et al.*,

Defendants,

and

NORTHERN ALASKA ENVIRONMENTAL
CENTER, *et al.*,

Intervenor-Defendants.

Case No. 3:24-cv-00143-SLG

STATE OF ALASKA,

Plaintiff,

and

Case No. 3:24-cv-00144-SLG

ALASKA OIL AND GAS
ASSOCIATION,

Intervenor-Plaintiff,

v.

BUREAU OF LAND MANAGEMENT,
et al.,

Defendants,

and

NORTHERN ALASKA ENVIRONMENTAL
CENTER, *et al.*,

Intervenor-Defendants.

NORTH SLOPE BOROUGH,

Plaintiff,

v.

BUREAU OF LAND MANAGEMENT, *et al.*,

Defendants,

and

NORTHERN ALASKA ENVIRONMENTAL
CENTER, *et al.*,

Intervenor-Defendants.

Case No. 3:24-cv-00145-SLG

RESPONSE TO NOTICE OF INTENT TO CONSOLIDATE

Intervenor-Defendants Northern Alaska Environmental Center et al. (collectively, Northern) submit this response to the Court's Notice of Intent to Consolidate. ECF No.

22 in Case No. 3:24-cv-00136-SLG; ECF No. 20 in Case No. 3:24-cv-00142-SLG; ECF No. 20 Case No. 3:24-cv-00143-SLG; ECF No. 32 in Case No. 3:24-cv-00144-SLG; ECF No. 23 in Case No. 3:24-cv-00145-SLG. Northern does not oppose consolidation.

However, Northern respectfully requests that the court maintain its prior order on the motions to intervene and not require the two sets of Intervenor-Defendants to consolidate their briefing. *See, e.g.*, Order re Mots. to Intervene, ECF. No. 25 in Case No. 3:24-cv-00136-SLG (modifying the schedule to allow for staggered briefing and for Intervenor-Defendants to each file consolidated responses to Plaintiffs' opening briefs). Each set of Intervenor-Defendants has distinct interests and approaches to these cases and will potentially present different arguments in their response briefs. Northern will strive to minimize duplicative briefing with Defendants and Intervenor-Defendants Friends of the Earth et al.

Federal Defendants identified various considerations regarding consolidation. *See, e.g.*, Defs.' Statement in Response to Notice of Intent to Consolidate, ECF No. 28 in Case No. 3:24-cv-00136-SLG. Northern agrees with the points raised in Defendants' response about the potential for joint scheduling and other measures implemented to date in this and other cases to aid with case management, absent formal consolidation, but defers to the Court's assessment of whether consolidation is warranted.

N. Alaska Envtl. Ctr. et al.'s Response to Notice of Intent to Consolidate
Voice of the Arctic Inupiat v. BLM, Case No. 3:24-cv-00136-SLG
ConocoPhillips Alaska, Inc. v. U.S. Dep't of the Interior, Case No. 3:24-cv-00142-SLG
N. Slope Expl. v. U.S. Dep't of the Interior, Case No. 3:24-cv-00143-SLG
State of Alaska v. BLM, Case No. 3:24-cv-00144-SLG
N. Slope Borough v. BLM, Case No. 3:24-cv-00145-SLG
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Respectfully submitted this 31st day of October, 2024.

s/ Suzanne Bostrom

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TRUSTEES FOR ALASKA

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ConocoPhillips Alaska, Inc. v. U.S. Dep't of the Interior, Case No. 3:24-cv-00142-SLG

N. Slope Expl. v. U.S. Dep't of the Interior, Case No. 3:24-cv-00143-SLG

State of Alaska v. BLM, Case No. 3:24-cv-00144-SLG

N. Slope Borough v. BLM, Case No. 3:24-cv-00145-SLG

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CERTIFICATE OF SERVICE

I certify that on October 31, 2024, I caused a copy of Northern Alaska Environmental Center et al.'s RESPONSE TO NOTICE OF INTENT TO CONSOLIDATE to be electronically filed with the Clerk of the Court for the U.S. District Court of Alaska using the CM/ECF system, which will send electronic notification of such filings to the attorneys of record in this case, all of whom are registered with the CM/ECF system.

s/ Suzanne Bostrom

Suzanne Bostrom

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